

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

IN RE SCANA CORPORATION SECURITIES LITIGATION)))))	Lead Case No. 3:17-cv-02616-MBS
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CONSENT MOTION FOR EXTENSION OF TIME

Pursuant to Local Rule 6.01, Defendants SCANA Corporation (“SCANA”), Kevin B. Marsh (“Marsh”), Jimmy E. Addison (“Addison”), Stephen A. Byrne (“Byrne”), Harold C. Stowe (“Stowe”), D. Maybank Hagood (“Hagood”), and James W. Roquemore (“Roquemore”) [collectively, “Defendants”], with the consent of counsel for Lead Plaintiffs West Virginia Management Board, Stitching Blue Sky Global Equity Active Low Volatility Fund, and Stitching Blue Sky Active Large Cap Equity USA Fund (collectively, “Plaintiffs”), hereby move this Court for an order extending the time for Defendants to answer Plaintiffs’ Consolidated Class Action Complaint (Dkt. No. 72) (the “Amended Complaint”) until June 14, 2019, and, in support thereof, respectfully state the following:

1. On March 30, 2018, Plaintiffs filed their Amended Complaint, which contains over 460 paragraphs and is over 180 pages in length.

2. On April 25, 2018, the Court granted a consent motion for extension of time (Dkt. No. 80), providing that Defendants’ motions to dismiss the Amended Complaint were due by June 4, 2018; Plaintiffs’ response to those motions was due by August 9, 2018; and Defendants’ reply memoranda were due by September 6, 2018. (See Dkt. No. 82.)

3. In accordance with the Court's Orders (Dkt. Nos. 82 & 89), Defendants filed their motions to dismiss on June 4, 2018 (Dkt. Nos. 92–95), and Plaintiffs filed their omnibus response to those motions on August 9, 2018 (Dkt. No. 105).

4. The deadline for Defendants' reply memoranda was extended pursuant to this Court's Orders (see Dkt. Nos. 111 & 114), and Defendants filed such reply memoranda in accordance therewith (see Dkt. Nos. 121–24).

5. On March 4, 2019, a hearing was held on Defendants' motions to dismiss.

6. On March 29, 2019, the Court issued its Order, denying the motions to dismiss of Defendants Marsh (Dkt. No. 94), Addison (Dkt. No. 92), and Byrne (Dkt. No. 93), and denying in part and granting in part the motion to dismiss of Defendants SCANA, Stowe, Hagood, and Roquemore (Dkt. No. 95). (See Dkt. No. 143.)

7. Based upon the Court's March 29, 2019 Order (Dkt. No. 143), the current deadline for Defendants to answer the Amended Complaint is April 12, 2019.

8. To facilitate coordination of a discovery plan, Defendants respectfully request that the Defendants' deadline to answer the Amended Complaint be extended until June 14, 2019.

9. Additionally, Defendants agree to hold a Rule 26(f) conference and to continue to participate in the Rule 26 meet and confer process prior to filing an answer.

10. Counsel for Defendants have conferred with Plaintiffs' counsel prior to filing this motion, and Plaintiffs consent to this request.

11. Defendants' current deadline for answering the Amended Complaint has not passed, this is the first request to extend such deadline, and this extension will not impact any other deadlines in the current schedule of this matter.

12. For the foregoing reasons, Defendants respectfully request that the Court enter an order providing that the time for Defendants to answer the Amended Complaint is extended up to and including June 14, 2019.

13. Attached to this motion is a corresponding [Proposed] Order.

Respectfully submitted this 11th day of April, 2019.

s/ Steven J. Pugh

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of April, 2019, I caused a true and correct copy of the foregoing to be filed with the Clerk of the Court using the CM/ECF system, which will automatically send notification of such filing and make available the same to all attorneys of record.

s/ Steven J. Pugh

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